

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN FRANCISCO DIVISION

17 IN RE: UBER TECHNOLOGIES, INC.,  
18 PASSENGER SEXUAL ASSAULT  
LITIGATION

19 This Document Relates to:

20 *All Cases*  
21  
22

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED [ECF No. 3868]**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

23  
24  
25  
26  
27  
28  
[PROPOSED] ORDER GRANTING PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS SHOULD BE SEALED [ECF NO. 3868]

Case No. 3:23-MD-3084-CRB,

Having considered statement in support of Plaintiffs' Administrative Motions to Consider Whether Another Party's Material Should Be Filed Under Seal, dated September 8, 2025, ECF 3868 ("Plaintiffs' Motion"), and Defendants' Unopposed Statement in Support of Plaintiffs' Motion, dated September 14, 2025, ECF \_\_\_\_ ("Statement in Support"), the Court hereby ORDERS that the following materials remain under seal as stated in Defendants' Statement in Support:

Document	Description	Defendants' Request
<b>[Unredacted] Letter Brief</b> (ECF 3868-3; redacted version at ECF 3867)	Portions of briefing referring to documents designated confidential	Narrowly tailored redactions at p. 2
<b>Plaintiffs' Exhibit A</b> in Support of Joint Discovery Letter Brief (ECF 3868-4)	Exhibit consisting of excerpt of Defendants' August 18, 2025 written responses and objections to Plaintiffs' Interrogatories and Requests for Admission in Lieu of 30(b)(5) Depositions, designated Highly Confidential Attorneys Eyes Only	Narrowly tailored redaction of non-public compensation information for one individual at 13:12
<b>Plaintiffs' Exhibit B</b> in Support of Joint Discovery Letter Brief (ECF 3868-5)	Exhibit consisting of excerpt of transcript of August 21, 2025 deposition of Chad Dobbs, designated Highly Confidential	Narrowly tailored redactions of deposition transcript at 104:9-108:23
<b>Plaintiffs' Exhibit C</b> in Support of Joint Discovery Letter Brief (ECF 3868-6)	Exhibit consisting of excerpt of document produced by Defendants in discovery, designated as Highly Confidential – Attorneys' Eyes Only, marked as Bates UBER_JCCP_MDL_003341903, marked as Exhibit 1897 for deposition of Chad Dobbs, detailing confidential internal business strategy	Maintain under seal
<b>Plaintiffs' Exhibit D</b> in Support of Joint Discovery Letter Brief (ECF 3868-7)	Exhibit consisting of document produced by Defendants in discovery, designated as Confidential, marked as Bates UBER_JCCP_MDL_003276626-45, detailing confidential internal business strategy	Maintain under seal

Document	Description	Defendants' Request
<b>Plaintiffs' Exhibit E</b> in Support of Joint Discovery Letter Brief (ECF 3868-8)	Exhibit consisting of document produced by Defendants in discovery, designated as Confidential, marked as Bates UBER_JCCP_MDL_002618039-45, detailing confidential internal business strategy	Maintain under seal

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Charles R. Breyer  
United States District Judge